

Certificate of Notice Page 1 of 4
United States Bankruptcy Court
Eastern District of Pennsylvania

In re:
Peter James Roberts
Ginger M. Roberts
Debtors

Case No. 14-15250-ref
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-4

User: SaraR
Form ID: pdf900

Page 1 of 1
Total Noticed: 5

Date Rcvd: Nov 20, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 22, 2017.

db/jdb	+Peter James Roberts, Ginger M. Roberts, 1009 Pawnee Street, Bethlehem, PA 18015-4126
cr	+AmeriCredit Financial Services, Inc. dba GM Financ, P O Box 183853, Arlington, tx 76096-3853
cr	ECAST Settlement Corporation, POB 29262, New York, NY 10087-9262

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

cr	E-mail/PDF: resurgentbknotifications@resurgent.com Nov 21 2017 01:46:50 CACH, LLC, PO Box 10587, Greenville, SC 29603-0587
cr	E-mail/PDF: gecsedri@recoverycorp.com Nov 21 2017 01:46:44 Synchrony Bank, c/o Recovery Management Systems Corporat, 25 SE 2nd Avenue, Suite 1120, Miami, FL 33131-1605

TOTAL: 2

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 22, 2017

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 20, 2017 at the address(es) listed below:

BRIAN CRAIG NICHOLAS	on behalf of Creditor MTGLQ Investors, LP	bnicholas@kmllawgroup.com,
bkgroup@kmllawgroup.com		
DANIELLE BOYLE-EBERSOLE	on behalf of Creditor Wells Fargo Bank, N.A.	debersole@hoflawgroup.com, bbleming@hoflawgroup.com
DAVID W. TIDD	on behalf of Debtor Peter James Roberts	bankruptcy@davidtiddlaw.com
DAVID W. TIDD	on behalf of Joint Debtor Ginger M. Roberts	bankruptcy@davidtiddlaw.com
DENISE ELIZABETH CARLON	on behalf of Creditor MTGLQ Investors, LP	bkgroup@kmllawgroup.com
FREDERICK L. REIGLE	ecfmail@fredreiglech13.com, ecf_frpa@trustee13.com	
GILBERT B. WEISMAN	on behalf of Creditor ECAST Settlement Corporation	notices@becket-lee.com
JILL MANUEL-COUGHLIN	on behalf of Creditor Wells Fargo Bank, N.A.	jill@pkallc.com,
chris.amann@pkallc.com/nick.bracey@pkallc.com;samantha.gonzalez@pkallc.com;harry.reese@pkallc.com		
LISA MARIE CIOTTI	on behalf of Trustee FREDERICK L. REIGLE	ecfmail@fredreiglech13.com,
ecf_frpa@trustee13.com		
MATTEO SAMUEL WEINER	on behalf of Creditor MTGLQ Investors, LP	bkgroup@kmllawgroup.com
SENIQUE MONEE MOORE	on behalf of Creditor Wells Fargo Bank, N.A.	senique.moore@wellsfargo.com
United States Trustee	USTPRRegion03.PH.ECF@usdoj.gov	
WILLIAM EDWARD CRAIG	on behalf of Creditor AmeriCredit Financial Services, Inc. dba GM Financial	ecfmail@mortoncraig.com, mhazlett@mortoncraig.com;mortoncraigecf@gmail.com
		TOTAL: 13

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Peter James Roberts Ginger M. Roberts aka Ginger Marlene Bauman aka Ginger Marlene Confer aka Ginger Marlene Roberts	<u>Debtors</u>	CHAPTER 13
MTGLQ Investors, LP	<u>Movant</u>	NO. 14-15250 REF
vs.		
Peter James Roberts Ginger M. Roberts aka Ginger Marlene Bauman aka Ginger Marlene Confer aka Ginger Marlene Roberts	<u>Debtors</u>	11 U.S.C. Section 362
Frederick L. Reigle	<u>Trustee</u>	

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtors' residence is **\$12,880.22**, which breaks down as follows:

Post-Petition Payments:	May 2016 through September 2016 at \$1,099.95/month
	October 2016 through December 2016 at \$1,165.47/month
	January 2017 through September 2017 at \$1,170.03/month
	October 2017 at \$1,224.34
Less Suspense Balance:	\$901.55
Fees & Costs Relating to Motion:	\$1,031.00
Total Post-Petition Arrears	\$12,880.22

2. The Debtor(s) shall cure the aforesaid arrearage in the following manner:
 - a). Within seven (7) days of the Court Order approving of and/or granting this stipulation, Debtor(s) shall tender a down payment of **\$8,000.00** toward the aforesaid arrearage;
 - b). Within seven (7) days of the Court Order approving of and/or granting this stipulation, Debtor shall file a motion to modify the Chapter 13 plan post-confirmation to provide for payment of the balance of the post-petition arrears of **\$12,880.22**, after subtracting the down payment amount, together with the pre-petition arrears;
 - c). Movant shall file an Amended or Supplemental Proof of Claim that includes the post-petition arrears of **\$12,880.22**, together with the pre-petition arrears.

d). The 410A form for a Proof of Claim shall not be required for this Amended or Supplemental Proof of Claim.

3. Beginning with the payment due November 1, 2017 and continuing thereafter, Debtor(s) shall maintain, and pay when due, the regular post-petition contractual monthly mortgage payment of \$1,224.34 (or as adjusted under the terms of the mortgage), which payment is due on or before the first (1st) day of each month (with late charges assessed after the 15th of the month).

4. Should Debtors provide sufficient proof of payments made (front & back copies of cancelled checks and/or money orders), but not credited, Movant shall adjust the account accordingly.

5. In the event that any of the payments due under Section 3 above are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtors and Debtors' attorney of the default in writing, and the Debtors may cure said default within FIFTEEN (15) days of the date of said notice.

6. If Debtors should fail to cure the aforesaid default within fifteen (15) days, or in the event that the down payment described in Section 2 above is not made within the time period specified in Section 2 (there being no requirement for Movant to send a Notice of Default with regard to said breach), Movant may file a Certification of Default with the Court, upon which the Court shall enter an Order granting Movant relief from the automatic stay with respect to the mortgaged property, and waiving the stay provided by Bankruptcy Rule 4001(a)(3), which the parties hereby agree to waive with respect to said Order. The Order shall be in the form set forth in the proposed order filed with Movant's Motion for Relief, or in a form substantially similar. ("Movant" in this paragraph and hereinafter refers to Movant or to any of its successors or assignees, should the claim be assigned or transferred.)

7. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the Court and the Court shall enter an order granting Movant relief from the automatic stay.

8. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

9. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the loan, mortgage and applicable law.

10. The parties agree that a facsimile signature shall be considered an original signature.

Date: November 15, 2017

By: /s/ Matteo S. Weiner, Esquire

Matteo S. Weiner, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322 FAX (215) 627-7734
Attorneys for Movant

Date: 11/15/17


David W. Tidd, Esquire
Attorney for Debtors

Date: 11/15/17


Frederick L. Reigle
Chapter 13 Trustee

Approved by the Court this ____ day of _____, 2017. However, the court retains discretion regarding entry of any further order.

Date: November 20, 2017


Bankruptcy Judge
Richard E. Fehling